

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

GABBY KLEIN, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

ALTRIA GROUP, INC., HOWARD A.
WILLARD III, and WILLIAM F.
GIFFORD, JR.,

Defendants.

Case No. 2:19-cv-05579-FB-AKT

**DECLARATION OF JEREMY A. LIEBERMAN IN FURTHER SUPPORT
OF MOTION OF DONALD SHERBONDY AND SARAH SHERBONDY
FOR APPOINTMENT AS LEAD PLAINTIFFS AND APPROVAL OF
LEAD COUNSEL AND IN OPPOSITION TO COMPETING MOTIONS**

I, Jeremy A. Lieberman, Esq., hereby declare as follows:

1. I am a Partner with Pomerantz LLP (“Pomerantz”), counsel on behalf of Donald Sherbondy and Sarah Sherbondy (together, the “Sherbondys”), and have personal knowledge of the facts set forth herein. My office is located at 600 Third Avenue, New York, New York 10016.

2. I make this Declaration in further support of the Sherbondys’ motion for appointment as Lead Plaintiff and approval of their selection of Pomerantz as Lead Counsel for the Class, and in opposition to competing motions.

3. Attached hereto as Exhibit A is a true and correct copy of a Joint Declaration executed by the Sherbondys.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed on December 16, 2019, at New York, New York.

/s/ Jeremy A. Lieberman
Jeremy A. Lieberman